IN THE UNITED STATES COURT FOR FEDERAL CLAIMS

No. 20-935 T

(Judge Marian Blank Horn)

MATTHEW AND KATHERINE CHRISTENSEN,

Plaintiffs,

v.

THE UNITED STATES,

Defendant

UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendant, the United States of America, pursuant to RCFC 6(b), respectfully moves for an extension of 60 days, from September 29, 2020, to, and including, November 28, 2020, of the deadline for defendant to file its answer to the complaint in the above captioned case. No prior enlargement of this deadline has been sought. Defendant's counsel has contacted plaintiff's counsel who has indicated that plaintiff does not object to this enlargement.

As good cause therefore, defendant's counsel has not received any information from the Internal Revenue Service and does not know who at IRS Chief Counsel is going to be assigned to this matter. As a result, defendant's counsel is not in a position to adequately respond to the allegations in the complaint or determine whether a dispositive motion should be filed instead of an answer.

WHEREFORE, defendant respectfully requests that the deadline for defendant to answer,

or otherwise respond, to the complaint in this case be extended to November 28, 2020.

s/Benjamin C. King, Jr.
BENJAMIN C. KING, Jr.
U.S. Department of Justice (Tax)
Court of Federal Claims Section
P.O. Box 26
Ben Franklin Post Office
Washington, D.C. 20044
Benjamin.c.king@usdoj.gov

RICHARD E. ZUCKERMAN
Principal Deputy Assistant Attorney General
DAVID I. PINCUS
Chief, Court of Federal Claims Section
MARY M. ABATE
Assistant Chief

s/Mary M. Abate
Of Counsel

Attorneys for the United States

Dated: September 25, 2020